

Origin: E&E Website
 Date: 12/17/2004
 First Name: Brian
 Last Name: O'Neill
 Title: Student/Environmental Professional;
 Topic: Aesthetics
 Comments:
 16 December 2004

G400

SUBMITTAL OF COMMENTS ON THE CABRILLO PORT LIQUIFIED NATURAL GAS DEEPWATER
 PORT
 ENVIRONMENTAL IMPACT STATEMENT AND ENVIRONMENTAL IMPACT REPORT
 DATED - OCTOBER 2004

Gentlemen,
 I am currently an environmental professional working for over 15 years on the Central Coast. Although my background is in air quality and environmental compliance, I am pursuing studies, on the postgraduate level in NEPA/CEQA Policy. To that end, I have chosen this program to provide a realistic example of the NEPA/CEQA process.
 I have reviewed the entire subject EIS/EIR and would like to compliment the authors on a well constructed document. I found it to have been developed in a very professional manner with no typographical errors of importance. I have developed a set of comments, below, that should not be construed as being antagonistic to the process in nature, but submitted in an effort to make the entire document a more valuable instrument and one that can be more easily interpreted by the general public. Following are my comments specific to Section 4.6 – Air Quality

Comment #1

My primary concern is with potential air quality impacts. While the project may deliver clean burning natural gas, the air impacts of the project itself are important to understand. Unfortunately, it is not clear to me how the air quality analysis was actually developed. With out a clear presentation of the basic assumptions used, this cannot be fully understood in a way that can be appreciated by the general public.

For example, the emission factors used to estimate construction and operational emissions are not included in the document – at least I could not find them in the text or within any appropriate appendices. Likewise, the operating schedules for the various engines and equipment (hard numbers) that will produce air emissions are not included.

I would like to see answers or clarifications to the following specifically included in the document:

1. What are the hours of operation for the equipment considered in the projected emissions?
2. Why is an emergency helicopter considered a "stationary source" but an LNG carrier while moored to the FSRU is not considered stationary?

Comment #2

There needs to be more detailed analysis and information shown so the public has adequate information in order to evaluate the accuracy of the estimated project emissions.

Also, any project like this should be required to use the best available technology to reduce air emissions to the greatest extent possible. In my experience, I believe it wise for users, and industry to do so before being allowed to purchase offsets within the affected air basins and mitigation measures should be always be required for any emission sources associated with a project that employ best available technology in order to protect the human and natural environment.

Comment #3

From my understanding of the document, the project proposes to use only natural gas fuel for LNG carriers to reduce emissions, yet it is included as a mitigation measure.

1. How will this natural gas only proposal be enforced?
2. Are emissions associated with LNG carriers while moored and offloading LNG subject to offset requirements?

G400-1

Section 4.6.1.3 contains a revised discussion of the emissions associated with Project construction and operation, including a description of equipment with operating schedules. The emission calculations, hours of operation, and emission factors associated with Project construction and operation are presented in Appendices G1 and G2, respectively.

The emergency helicopter is considered a mobile source and has been removed from stationary source emission calculations.

G400-2

The Project has been modified since issuance of the March 2006 Revised Draft EIR. See Section 1.4.2 for a summary of Project changes. LNG carriers associated with the Project would operate on natural gas (boil-off gas from the LNG cargo) with 1% diesel pilot during all operations in California Coastal Waters. Tugs and crew vessels would have diesel engines equipped air pollution control technology that would result in emissions comparable to emissions from natural gas-fueled engines.

Section 4.6.1.3 contains information on emissions from Project vessels operating in California Coastal Waters, as defined by the California Air Resources Board.

G400-3

Section 6.1 discusses enforcement of mitigation measures.

The US EPA has determined that emissions from the FSRU and LNG Carriers are not subject to emission offset requirements. Section 4.6.2 provides an updated discussion of relevant regulatory requirements, including emission offset requirements. Section 4.6.4 contains a discussion of proposed emission reduction projects that would partially offset Project-related emissions.

G400-1

G400-2

G400-3

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 Topic: Aesthetics

Comments:

Comment #4

Since I have experience in these matters particularly in Santa Barbara County, it seems to me that the cumulative impacts analysis has a number of inconsistencies. By inconsistencies, I cannot follow a logical thought process in that the alternative location in the Santa Barbara Channel is actually located in an area where the SBCAPCD is basically the lead agency not the VCAPCD-correct? It would be my understanding from reviewing the document that that means the alternative site would be subject to compliance with SBCAPCD rules and regulations not VCAPCD. Yet the discussion on eh alternative doesn't identify that SBCAPCD is the responsible district I would appreciate clarification on this point. In addition please clarify what their attainment status is, what rules and regulations apply to the proposed alternative, and if offset requirements would be similar.

Comment #5

Similar to my comment above, the logic process is unclear to me about the LNG carriers being divided into separate components or activities for emission reporting.

1. What will the individual emissions associated with LNG carrier transit, hoteling, and offloading actually be?
2. Will LNG carrier offloading always be done using carrier-based engines/equipment or FSRU-based equipment?
3. What provisions are to be policed to ensure this important stipulation continues to always occur?

Comment #6

As another example of my not being able to follow the logic process I can see that the estimated emissions from the main generators were calculated assuming combustion of only natural gas. However, further on Table 4.6-3 indicates that they could also operate on diesel fuel. Please clarify this discrepancy.

1. Could there be a situation that could result in using diesel for these engines? (something like a homeland security issue or natural disaster and maybe an economic situation where diesel becomes cheaper than LNG)
2. How would this affect the projected emissions and the tables in this section?

Comment #7

Lastly, on Page 4.6-16 I see indications that the emissions for supply and support vessels are based on the use of low-sulfur diesel or natural gas. Again like above, Table 4.6-3 reads that all the support and supply vessels as operating on CA diesel.

1. Which support/supply vessel emissions were calculated based on the consumption of natural gas?

I hope that these comments help point out a few things that I observed during my review. As I indicated above, I believe that this is a rather well written document and one that can easily be made into an instrument to further the process, safeguard the communities and most importantly be one that is well understood by the general public. Thank you for the opportunity to submit these comments.

Good Luck and Happy Holidays

Brian A. O'Neill

G400-4

Under the Santa Barbara Channel/Mandalay Shore Crossing/Gonzales Road Pipeline Alternative, the nearest onshore area to the FSRU would still be Ventura County. Thus, the local jurisdiction would be the VCPACD under both the proposed Project and this alternative. Section 4.6.5.2 discusses the air quality impacts of this alternative.

G400-5

Appendix G2 contains detailed emission calculations for LNG carriers.

G400-6

The LNG transfer pumps would be located on each LNG carrier and powered by equipment on the LNG carriers. Sections 2.2.3 and 4.6.1.3 contain revised discussions of this topic.

G400-7

Under the current design, the FSRU would not be equipped with LNG transfer pumps and would not have the capability to provide power to transfer pumps on LNG carriers.

Impact AIR-4 and Impact AIR-5 in Section 4.6.4 have been revised to provide specific information regarding the Applicant's emissions reduction programs and their review by the USEPA and the California Air Resources Board (CARB). As part of air permit-to-construct application procedures, the Applicant has committed to the USEPA to achieve emissions reductions (in addition to reductions inherent to the Project) to an amount equal to the FSRU's annual NO_x emissions. The Applicant has executed contracts to retrofit two marine vessels (long haul tugs) by replacing the propulsion engines of each vessel with modern low emitting engines (Tier 2 compliant diesel-fired engines). At the request of the USEPA and the CARB, the Applicant conducted source testing to assist in determining the emission reductions expected as a result of the retrofits. Both the USEPA and the CARB have reviewed the results, but there is not yet a consensus on the estimated emission reductions from the mitigation proposal.

Based on the USEPA's and CARB's estimates, the proposed Emissions Reduction Program (AM AIR-4a) would provide for NO_x emission reductions greater than the estimated annual NO_x emissions from FSRU equipment and estimated NO_x emissions from operation of LNG carrier offloading equipment. However, the total emission reductions would be less than the annual NO_x emissions estimated for all operations (FSRU and Project vessels) in California Coastal Waters, as defined by the CARB. According to

CARB, the emission reduction proposal "represents more than what would otherwise be required by the current determination of applicable regulations."

Appendix G9 contains a memorandum from the CARB to the CSLC on this topic. Electronic copies of the Applicant's reports submitted to the USEPA that detail the tug retrofits and related emission reductions are available at www.epa.gov/region09/liq-natl-gas/cabrillo-air.html.

G400-8

The FSRU's main and backup generators have the capability to operate with natural gas or diesel. The generators would operate on 100 percent diesel only during emergencies, monthly maintenance testing, training drills, and initial commissioning of the FSRU. Section 4.6.1.3 contains a revised discussion of this topic.

G400-9

The generators would operate on 100 percent diesel only during emergencies, monthly maintenance testing, training drills, and initial commissioning of the FSRU. The revised emission estimate summaries presented in Section 4.6.1.3 include emissions associated with diesel fuel use in the FSRU main generators. Appendix G2 contains the calculations for operational emissions.

G400-10

Support and supply vessels would use only ultra low sulfur diesel. Section 4.6.1.3 summarizes emission estimates, and Appendix G2 contains calculations for operational emissions.

Name (Please Print): WALLY OLSEN Source: Public Meeting - Oxnard AM
 Organization/Agency: Home owner Date: 11/30/2004
 Street Address: 3631 Glen Abbey Ln
 City: Oxnard State: CA Zip Code: 93036
 Email address: wallypeggy@adelphia.net

Please provide written comments in the space below and drop this form into the comment box.

You may also submit comments

- Electronically through the Project Web site at <http://www.cabrilloport.ene.com>
- Electronically through the Docket Management System Web site (docket number 16877) at <http://dms.dot.gov>.
- Or by mail or email to following addresses:

Docket Management Facility
 Room PL-401
 400 Seventh Street SW
 Washington, DC 20590-0001

California State Lands Commission
 100 Howe Avenue, Suite 100-South
 Sacramento, CA 95825
ogginsc@slc.ca.gov
 Attention: Cy Oggins

All comments must be received by 2 p.m. PST, December 20, 2004

Comments (Use other side or attach additional sheets if necessary): _____

I support this program. It lies
within a few hundred yards of one of
the alternative pipeline routes.

No action will be taken until the environmental review process is completed.

G118-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website
Date: 12/19/2004
First Name: Roya
Last Name: Omar
Address: 458 Wooley Rd. W
City: Oxnard
State: CA
Zip Code: 93030
Topic: Public Safety: Hazards and Risk Analysis

Comments: I've just read through some of the recent public comment letters and I noticed that most of the people were concerned with safety and terrorist attacks. In my opinion there are much worse terrorist targets that are already existing along the coastline. There is no terrorist threat in my opinion. We should stop trying to make unreasonable excuses to stop this project from happening because there are so many reasons that this should happen. The safety record for this sort of operation is flawless and there is no threat for an explosion and even if there was an explosion the port is located so far away that it would have no effect on the surrounding population.

G183-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website
Date: 12/17/2004
First Name: Alan
Last Name: Ornbaun
Address: 104 Wild Horse Valley
City: Novato
State: CA
Topic: Biological Resources - Marine
Comments: For scuba divers and marine lovers all along the California coast protecting our marine wildlife is priority number one. I know LNG facilities have a blemished record in protecting our precious waters. The Cabrillo Port project is different due to it being miles away from our shore. Cabrillo Port has this marine lover's endorsement.

G099-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website
Date: 12/15/2004
First Name: Courtney
Last Name: Ornbaun
Address: 277 Tradewinds #10
City: San Jose
State: CA
Zip Code: 95123
Topic: Public Safety: Hazards and Risk Analysis
Comments: The fact that the U.S.Coast Guard and Department of Homeland Security will have to approve a comprehensive safety plan for the Cabrillo Port facility is comforting. If the project meets these agencies strict standards, I feel the safety question is a non-issue. If it is good enough for them, it works for me.

G026-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website
Date: 12/17/2004
First Name: Pauline
Last Name: Ornbaun
Address: 104 Wild Horse Valley
City: Novato
State: CA
Topic: Biological Resources - Marine

Comments: My husband and I love spending time in the waters of our amazing California coastline. We are environmentalist and do anything we can to protect our marine life. I usually disapprove of any development in our coastal waters due to poor environmental records by companies. I support the Cabrillo Port project due to its distance from our coastline and how it is a temporary structure. I feel this is a sensible project that will help our energy crisis.

G138-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website
Date: 12/17/2004
First Name: Rick
Last Name: Otis
Title: President and CEO
Address: 8530 Ave. Costa Norte
City: San Diego
State: CA
Zip Code: 92154
Phone No.: 619-661-1575
Email Address: hro@rpmhmc.com
Topic: Energy and Minerals

Comments: Over the past few years I have seen my business drastically affected by soaring utility costs. We have had to down size, lay off people and re-organize how we do business due to the higher costs associated with doing business in California. From what I understand of the BHP Cabrillo Deepwater Port LNG Porject, it will supply California with approximatley 13% of our daily Natuaral Gas consumption. I am looking forward to the Cabrillo Deepwater Port lowering my overhead costs so I can grow my business, putting more California families to work.

G127-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.